

1 UNITED STATES BANKRUPTCY COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5 In re:

6 PG&E CORPORATION,

7 -and-

8 PACIFIC GAS AND ELECTRIC COMPANY,

9 Debtors.

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

10 ☐ Affects PG&E Corporation

11 ☐ Affects Pacific Gas and Electric Company

12 ☒ Affects both Debtors

JOINT NOTICE OF APPEAL

13 **All papers shall be filed in the Lead Case, No.
14 19-30088 (DM).*

15 NOTICE IS HEREBY GIVEN that Paradise Unified School District, Northern Recycling
16 and Waste Services, LLC/Northern Holdings, LLC, and Napa County Recycling & Waste Services,
17 LLC/Napa Recycling & Waste Services, LLC; Adventist Health System/West and Feather River
18 Hospital d/b/a Adventist Health Feather River (together, “**Adventist Health**”); and Comcast Cable
19 Communications, LLC and all affiliates (together, “**Comcast**,” and collectively with Paradise
20 Unified School District, Northern Recycling and Waste Services, LLC/Northern Holdings, LLC,
21 Napa County Recycling & Waste Services, LLC/Napa Recycling & Waste Services, LLC, and
22 Adventist Health, the “**Appellants**”), by and through their undersigned counsel, hereby appeal to the
23 United States Bankruptcy Appellate Panel of the Ninth Circuit, pursuant to 28 U.S.C. § 158(a) and
24 Rule 8003 of the Federal Rules of Bankruptcy Procedure, from the *Order Confirming Debtors’ and*
25 *Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* [Bankr. Dkt.
26 No. 8053] (the “**Confirmation Order**”)¹ entered in the above-captioned case on June 20, 2020,

27 ¹ Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Confirmation
28 Order.

1 which Confirmation Order incorporates the Fire Victim Trust Agreement and all exhibits, including
2 the Fire Victim Claims Resolution Procedures, filed with the Court on June 21, 2020 [Bankr. Dkt.
3 No. 8057]. A copy of the Confirmation Order is attached hereto as Exhibit A. A copy of the Fire
4 Victim Trust Agreement and all exhibits is attached hereto as Exhibit B.

5 As will be set forth in greater detail in the statement of issues and in their merits briefing,
6 while the final order from which this appeal lies is the Confirmation Order, Appellants do not
7 challenge the Court's determination to confirm the Plan, which became effective on July 1, 2020,
8 and whose effectiveness is not challenged in this appeal. Rather, this appeal is addressed to certain
9 aspects of the Fire Victim Trust Agreement, the Court's approval of which is incorporated into the
10 Confirmation Order.

11 Pursuant to 28 U.S.C. § 158(a)(1), the Confirmation Order is appealable as a matter of right.
12 Pursuant to 28 U.S.C. § 158(c)(1), the Appellants hereby elect to have this appeal heard by the United
13 States Bankruptcy Appellate Panel of the Ninth Circuit.

14 Counsel for the Debtors, the Tort Claimants Committee, the pre-petition shareholders, and
15 the Fire Victim Trustee all participated in the confirmation hearing. Appellants believe that upon the
16 effectiveness of the Plan, the only potential appellee with a concrete stake in the appeal and thus with
17 standing to defend the Bankruptcy Court's determination is the Fire Victim Trust. In an abundance
18 of caution, however, the Reorganized Debtors are also listed as Appellees. Those parties and the
19 names, addresses and telephone numbers of their respective attorneys are set forth below.

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Party	Counsel
Fire Victim Trust	<p>BROWN RUDNICK LLP Joel S. Miliband (SBN 077438) 2211 Michelson Drive Seventh Floor Irvine, California 92612 Telephone: (949) 752-7100 Facsimile: (949) 252-1514 Email: jmiliband@brownrudnick.com</p> <p>BROWN RUDNICK LLP David J. Molton (SBN 262075) Seven Times Square New York, New York 10036 Telephone: (212) 209-4800 Facsimile: (212) 209-4801 Email: dmolton@brownrudnick.com</p>
Reorganized Debtors	<p>WEIL, GOTSHAL & MANGES LLP Stephen Karotkin (<i>pro hac vice</i>) Ray C. Schrock, P.C. (<i>pro hac vice</i>) Jessica Liou (<i>pro hac vice</i>) Theodore E. Tsekerides (<i>pro hac vice</i>) 767 Fifth Avenue New York, New York 10153-0119 Telephone: (212) 310-8000 Facsimile: (212) 310-8007 E-mail: stephen.karotkin@weil.com, ray.schrock@weil.com, jessica.liou@weil.com, theodore.tsekerides@weil.com</p> <p>KELLER BENVENUTTI KIM LLP Tobias S. Keller (SBN 151445) Peter J. Benvenutti (SBN 60566) Jane Kim (SBN 298192) 650 California Street, Suite 1900 San Francisco, California 94108 Telephone: (415) 496-6723 Facsimile: (650) 636-9251 E-mail: tkeller@kbbkllp.com pbenvenutti@kbbkllp.com jkim@kbbkllp.com</p>

1 Dated: July 2, 2020

2 REED SMITH LLP

3 /s/ David Weiss

4 David E. Weiss (SBN 148147)
5 Peter Munoz (SBN 66942)
6 101 Second Street Suite 1800
7 San Francisco, California 94105-3659
8 Telephone: (415) 543-8700
9 Facsimile: (415) 391-8269
10 dweiss@reedsmith.com
11 pmunoz@reedsmith.com

12 *Attorneys for PARADISE UNIFIED SCHOOL*
13 *DISTRICT, NORTHERN RECYCLING AND*
14 *WASTE SERVICES, LLC/NORTHERN*
15 *HOLDINGS, LLC, AND NAPA COUNTY*
16 *RECYCLING & WASTE SERVICES,*
17 *LLC/NAPA RECYCLING & WASTE*
18 *SERVICES, LLC*

19 NORTON ROSE FULBRIGHT US LLP

20 /s/ Rebecca Winthrop

21 Rebecca J. Winthrop (SBN 116386)
22 Robin D. Ball (SBN 159698)
23 555 South Flower Street, Forty-First Floor
24 Los Angeles, California 90071
25 Telephone: (213) 892-9200
26 Facsimile: (213) 892-9494
27 rebecca.winthrop@nortonrosefulbright.com
28 robin.ball@nortonrosefulbright.com

Attorneys for ADVENTIST HEALTH

1 WILMER CUTLER PICKERING HALE
2 AND DORR LLP

3 /s/ Craig Goldblatt

4 Craig Goldblatt (*Pro Hac Vice* admitted)
5 1875 Pennsylvania Ave., NW
6 Washington DC 20036
7 Telephone: (202) 663-6000
8 Facsimile: (202) 663-6363
9 craig.goldblatt@wilmerhale.com

10 and

11 Lauren Lifland (*Pro Hac Vice* admitted)
12 Allyson Pierce (SBN 325060)
13 WILMER CUTLER PICKERING HALE
14 AND DORR LLP
15 250 Greenwich Street
16 New York, New York 10007
17 Telephone: (202) 230-8800
18 Facsimile: (202) 230-8888
19 lauren.lifland@wilmerhale.com
20 allyson.pierce@wilmerhale.com

21 *Attorneys for COMCAST*